

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
)
) **Chapter 11**
GT REAL ESTATE HOLDINGS, LLC)
) **Case No. 22-10505 (KBO)**
)
Debtors.)

**NOTICE OF FILING AND PERFECTION OF STATE-LAW MECHANICS' LIEN
FILED, PURSUANT TO BANKRUPTCY CODE SECTION 546(b)(2), AGAINST
PROPERTY OF THE DEBTOR, BY CREDITOR BAKER ROOFING COMPANY**

PLEASE TAKE NOTICE THAT, pursuant to section 546(b)(2) of the United States Bankruptcy Code ("BCY Code"), Baker Roofing Company ("Baker"), a creditor of the above-captioned Debtor, has:

- a. On June 10, 2022 filed a mechanics' lien (copy attached as Exhibit A hereto) against property of the Debtor located at 280 Mt. Gallant Road, Rock Hill, South Carolina 29703 (the "Property") (legal description attached in Exhibit A), timely under South Carolina law (S.C. Code Ann. Sec. 29-5-10, et. seq.); and
- b. This day, hereby filed notice, pursuant to section 546(b)(2) of the BCY Code, in order to preserve and perfect said mechanics' lien against the Property, including any and all proceeds, products, rents, profits and offsprings thereof. This notice is filed within 90 days after the lien was filed.

The lien is in the amount of \$119,132.87. This notice is in lieu of filing suit or seizing property to the extent same might otherwise be required under applicable state law. Neither the South Carolina filing nor this one are intended to waive or release any of Baker's rights, all of which – including the right to assert addition claims against the Debtor or property of the Debtor, in any category or amount - are fully reserved.

Dated: June 15, 2022
Wilmington, Delaware

MARGOLIS EDELSTEIN

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